



## **PRIVACY POLICY**

The purpose of this Privacy Policy is to provide information on your rights under Regulation (EU) 679/2016 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as "GDPR"), Law 15/1999 of 13 December on the Protection of Personal Data (hereinafter referred to as "LOPD").

### **1. BASIC INFORMATION ON DATA PROTECTION**

**RESPONSIBLE:** the controller is INTERMUNDIAL XXI, S.L. (hereinafter "INTERMUNDIAL") is a Spanish company, with address in Madrid, C / Irún, 7, Zip Code 28008, with CIF B81577231, email [lopd@intermundial.es](mailto:lopd@intermundial.es), which holds the status of insurance broker, and is registered in the administrative register of insurance and reinsurance distributors of the Spanish supervisory authority, Directorate General of Insurance and Pension Funds, with registration number J-1541. registered in the Commercial Register of Madrid, volume 11482, book 0, folio 149, sheet number M-180.298.

For clarification purposes, the entity FIT 2 TRIP SPAIN, S.L. (hereinafter, "FIT 2 TRIP SPAIN") acts as an external collaborator of INTERMUNDIAL, so, in accordance with article 203 of Royal Decree-Law 3/2020, of 4 February, of insurance distribution, FIT 2 TRIP SPAIN holds the status of processor.

**PURPOSES OF TREATMENT:** personal data are processed for the following purposes:

- Control and maintenance of the contractual relationship, or where appropriate pre-contractual, in the case of requests for information on products and services.
- For the realization of commercial communications on insurance and related products and services, and newsletters on topics related to tourism and the insurance sector.
- For fraud prevention and security maintenance, in accordance with applicable regulations.

**LEGITIMATION:** The above treatments are covered by the following legal bases legitimizing's:

- The need for processing for the performance of the contract or for the application at the request of the contract of pre-contractual measures.
- Unequivocal consent if, for the proposed contract or for it to collect the necessary health data from the interested party.

- Unequivocal consent in the case of sending commercial communications, news and newsletter by electronic means.
- Satisfaction of the legitimate interests of the controller in the event of postal shipments without prejudice to the right to object to such processing.

**DESTINATIONS:** The data will be communicated to the Insurers under the insurance contract signed.

Depending on the services or products in which You are interested or contract, your personal data may be communicated to third parties, such communication being necessary for the proper fulfillment of the legal, contractual and/or purpose obligations indicated in this privacy policy.

In those cases where for better management and provision of the services, there is access to data on assistance of third parties, INTERMUNDIAL, guarantees the maintenance of confidentiality in the processing of personal data. If such third parties are suppliers, they will not process your data for their own purposes that have not been previously consented to or established by law.

The data may also be communicated to third parties in the following cases:

- If we are required to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property or security of INTERMUNDIAL, our customers or others.
- By provision of law, regulation or by virtue of a decision of a competent, judicial or regulatory authority or, if necessary, in order to preserve its rights and interests.

**RIGHTS:** Those affected are entitled to exercise the rights of Access, Rectification, Deletion, Opposition, Limitation of Processing and Portability of Personal Data.

In addition, in all cases where the processing is based on consent, this can be revoked, provided that the processing is not necessary for the performance of the contract.

**DETAILED INFORMATION:** See Detailed Information on Data Protection.

## 2. DETAILED INFORMATION ON DATA PROTECTION

This Data Protection Policy regulates the processing of personal data provided by the Data Subject through the Internet website [www.fit2trip.es](http://www.fit2trip.es) (hereinafter, the "Website") that is made available to Internet users. This Policy is an integral part of the Legal Notice accessible at all times from the Website.

The Data Subject guarantees that the data provided are true, accurate, complete and up-to-date, being responsible for any damage, direct or indirect, that may be caused as a result of the breach of such obligation. In the event that the data provided belongs to a third party, the Data Subject guarantees that it has informed that third party of the aspects contained in this document and obtained its authorization to provide their data for the purposes indicated.

The Website may provide functionality for users to share content through third-party applications, such as Facebook or Twitter. These applications may collect and process information related to user navigation on different websites.

Any personal information collected through these applications may be used by third party users of these applications, and their interactions are subject to the privacy policies of the companies that facilitate the applications.

The Website may host blogs, forums, and other social media applications or services in order to facilitate the exchange of knowledge and content. Any personal information provided by the user may be shared with other users of that service, over whom neither INTERMUNDIAL nor FIT 2 TRIP SPAIN has any control.

In order to offer information or services of interest depending on the location of the Data Subject, we may access data related to the geolocation of the Data Subject's device, in cases where the user's settings for this purpose allow it.

To the usual personal data that are included in the user's registration forms (name, address, email, dates of stay, credit card details, health data...), for the purposes of technical security and system diagnostics and in an anonymised or aggregated manner, the IP address (identification number of the Internet access of the device, which allows devices, systems and servers to recognize and communicate with each other) may be recorded. Such information may also be used for analytical web performance purposes.

The special data collected will be processed in accordance with Regulation (EU) 679/2016 of the European Parliament and of the Council of 27 April 2016 and Organic Law 15/1999 of 13 December on the Protection of Personal Data, and after the prior information provided and accepted and if necessary, with the consent of the user.

We do not store your credit card details, but only that information necessary for the correct management of the contracted services.

## **PURPOSE OF TREATMENT**

The main purpose of the processing of personal data is the management and control of the contractual relationship, or where appropriate pre-contractual, acquired with the user through its registration, request for information and/or contracting services. The above purpose includes, therefore, the processing of claims arising from the insurance contract, any assistance you request during the trip, the reporting of any changes in our service, the management of queries or request for information that could be made through email or telephone, among others.

As regards commercial communications, these will consist of information on insurance and related products and services, as well as the sending of newsletters on topics related to tourism and the insurance sector. Commercial communications will also include the development of a customer profile to send you advertising about our products according to your needs, without prejudice to the option to object at any time to the aforementioned processing, sending an email to [info@fit2trip.com](mailto:info@fit2trip.com). These communications can also be made through electronic means such as email, short messages or SMS, or the like. In these cases, only those interested parties who have previously authorized the same or requested them will be made. In e-mail communications, such means shall include an email address or other valid electronic address where this right may be exercised.

This policy determines the obligation to collaborate and provide information that also includes personal data, to certain authorities and tax authorities, judges and courts, etc. not only for the prevention of fraud, but also for the fulfillment of tax obligations, etc.

## **TERM OF CONSERVATION OF PERSONAL DATA:**

The data provided will be kept for the entire term of the insurance contract signed, as well as for a period afterwards in order that we can comply with our legal, tax and/or accounting obligations.

In this way, the data will be secured and kept for the limitation period of the actions that may arise from the contractual relationship by you subscriber. After the limitation periods, the data will definitely be deleted.

In the specific case of curriculum the data will be kept for a maximum period of one year, unless otherwise indicated by the interested party.

## **INTERESTED RIGHTS:**

The Data Subject may exercise their rights at any time and free of charge in the form described below.

The Data Subject has the right to obtain confirmation as to whether INTERMUNDIAL processes personal data concerning him or her, as well as to access his or her personal data, request the rectification of inaccurate data or, where appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes that it was collected.

In certain circumstances, the Data Subject may request the limitation of the processing of his or her data, in which case they will only be kept for the exercise or defense of claims.

In certain circumstances and for reasons related to your particular situation, the Data Subject may object to the processing of their data. INTERMUNDIAL will cease the processing of the data, except for overriding legitimate reasons, or the exercise or defense of possible claims.

In certain circumstances, the Data Subject may request the portability of his or her data. In case you want your data to be processed by another firm, INTERMUNDIAL will facilitate the portability of your data to the new controller whenever possible.

In addition, in all cases where the processing is based on consent, it can be revoked, provided that the processing is not necessary for the performance of the contract.

The Data Subject may raise any questions in relation to this Policy as well as exercise their rights in the legally provided terms and to address a communication by post to: INTERMUNDIAL XXI, S.L., Calle Irún 7, 1° A, 28008 Madrid, Spain, or email to: [lopd@intermundial.es](mailto:lopd@intermundial.es) with indication of the corresponding application and accompanied by a copy of their ID or identity document.

Ultimately you can request information about your rights and file a complaint with the Spanish Data Protection Authority, which is the Spanish Data Protection Agency domiciled at Jorge Juan Street, no. 6, 28001 Madrid.

## **TRANSFERS TO THIRD COUNTRIES**

The data are generally processed in the European Economic Area or in countries that have been declared with an adequate level of protection.

In other cases we guarantee the security and legitimacy of the processing of data by requiring our suppliers to have binding corporate rules to ensure the protection of information in a manner similar to those set out in European standards, or to subscribe to the model clauses of the European Union.

#### **COOKIES**

INTERMUNDIAL will only use data storage and retrieval devices ("Cookies") when the User has given his prior consent to do so in accordance with what is indicated in the pop-up window of the User's browser when first accessing the Website and in the other terms and conditions indicated in the Cookies Policy of this Website that every User must know.

#### **SAFETY MEASURES**

INTERMUNDIAL adopts the security levels required by the GDPR appropriate to the nature of the data being processed at all times. Notwithstanding the above, technical security in a medium such as the Internet is not impregnable and there may be intentional actions by third parties, although all means are put at our disposal to prevent such actions.

#### **Confidentiality**

The personal data collected through the Website or through the different communications that are maintained with the User will be treated with confidentiality, committing INTERMUNDIAL to keep secret from them in accordance with the provisions of the applicable legislation.

#### **Minors**

Minors may not use the services available through the Website without the prior authorization of their parents, guardians or legal representatives, who will be solely responsible for all acts performed through the Website by the minors in their care, including the completion of the forms with the personal data of such minors and the marking, where appropriate, the accompanying boxes.

#### **MODIFICATION OF THIS POLICY AND DURATION**

INTERMUNDIAL may modify at any time the Privacy Policy indicated herein, being duly published as it appears here. This Privacy Policy will remain in effect until modified by others duly published.

For this purpose, this Privacy Policy was last updated to date 20/01/2021.